

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

WILLIAM ENGELMAN

Plaintiff,

-v-

NITV FEDERAL SERVICES, LLC

Defendant.

) Case No. 1:06-cv-00223-MHW  
)  
) Judge: Michael Barrett  
)  
)  
)  
) DECLARATION OF JAMIE M.  
) RAMSEY IN SUPPORT OF  
) MOTION TO EXTEND DISCOVERY  
) AND DISPOSITIVE MOTION  
) DEADLINES  
)

I, Jamie M. Ramsey, declare as follows, based on my personal knowledge:

1. I am a partner with the law firm of Keating, Muething & Klekamp, P.L.L., One East Fourth Street, Suite 1400, Cincinnati, Ohio 45202. I, along with Christy M. Nageleisen, represent Defendant/Counterclaim-Plaintiff NITV Federal Services, LLC ("NITV") in connection with defending the within action. I submit this Affidavit in Support of NITV's Motion to Extend Discovery and Dispositive Motion Deadlines.

2. After Plaintiff William Engelman provided written responses to Defendant/Counterclaim Plaintiff NITV Federal Services's Interrogatories and Requests for Production on January 22, 2007, my office requested dates upon which Plaintiff and Plaintiff's identified witnesses could be deposed.

3. On March 20, 2007, having not received potential deposition dates for Mr. Engelman, I sent a letter and a formal notice of Mr. Engelman's deposition for April 5, 2007. See Exhibit A.

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4. On or about April 3, 2007, I contacted Mr. Kaiser to confirm that his client would be appearing for the deposition. Only then did Mr. Kaiser inform me that his client was not available.

5. During that conversation, in exchange for Defendant's withdrawal of the notice of deposition for April 5, 2007, Mr. Kaiser promised to provide me with deposition dates for Plaintiff and Plaintiff's wife no later than the close of business on April 5, 2007.

6. On April 9, 2007, four days after the deadline, Mr. Kaiser finally provided deposition dates, all of which are beyond the current discovery deadline.

The undersigned affirms, under the penalties of perjury, that the foregoing representations are true. This Declaration is executed this 10th day of April, 2007.

s/ Jamie M. Ramsey  
Jamie M. Ramsey

Dated: April 11, 2007

Respectfully submitted,

/s/ Christy M. Nageleisen  
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